

FCC National Database Industry Collaboration and Proposal

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Topic 1: Introduction and Recommendations

In the Notice of Proposed Rule Making (NPRM), the Commission raised concerns about waste, fraud, and abuse in the Lifeline and Link Up program (Lifeline/Link Up). The comments filed on April 21 in response to these concerns showed a remarkable degree of support for the development and use of a centrally-administered national database to handle program eligibility verification and eliminate duplicate benefits. The key question now before the Commission – and the focus of this document – is how best to implement this database (the Eligibility and Duplicate Management Platform (EDMP)) given the myriad and often complex tasks it is expected to perform.

Through their considerable experience in developing and operating real-time or near real-time lifeline-related databases for entities engaged in Lifeline/Link Up, the Professionals for Lifeline and Link-up Reform (the PLLR, see Attachment A) believe the Commission can maximize its chances of success in implementing the database by adopting a phased approach to integrating functionalities. By moving in stages, the Commission can build upon the interim solutions currently being deployed by Eligible Telecommunications Carriers (ETCs) and third-party service bureaus and can drive the implementation of the EDMP to which all impacted parties (ETCs, states, USAC, FCC) may integrate with the minimum needed to change their processes.

Recommendations

The PLLR believes the Commission can best achieve the goals stated in its NPRM by implementing a phased approach.

Phase I – Duplicate Elimination and Preference Management

In the first phase of the solution, which could be accomplished within months after a Commission formal rulemaking, a neutral third-party administrator (Administrator) would develop and implement, as part of the EDMP, a Duplicate Elimination and Preference Management System (DEPM or Phase I). As further described below in Topic 3, Overview of Phase I Operational Requirements, Phase I would:

- (1) Eliminate all duplication in the system by:
 - (a) Requiring all ETCs to provide their customer data in electronic format by a set due date to the Administrator, which will identify all duplicates based on the rules established by the FCC;

- (b) Establishing a reach out process to those persons identified as receiving duplicate benefits; and
 - (c) Providing a process by which a consumer may choose his or her carrier of choice;
- (2) Provide an ongoing carrier-neutral pre-qualification process to identify and verify whether a household or individual is already receiving a Lifeline/Link Up benefit and thereby prevent new enrollments that would cause a duplicate benefit within the service offering; and
- (3) Allow consumers to easily choose their carrier of choice to take advantage of service offerings provided by competing ETCs.

This document is primarily focused on the requirements for the Phase I solution.

Phase II – Eligibility and Verification

The second phase (Phase II) would be the implementation of a technological solution to enable the full qualification of a consumer as well as automated annual verifications. Phase II would retain all of the duplicate prevention capabilities of Phase I and would likely take more than 6 months to implement. Phase II would build on the structure and systems developed in Phase I, thus dramatically reducing the cost and effort required to expand the functionality of the DEPM. Through the addition of a state administration interface, Phase II allows a state to configure, manage, and audit the dynamic rules engine created in Phase I to the state's documentation requirements, thereby providing ETCs, solution providers, and state administrators an automated process for determining the eligibility of Lifeline/Link Up enrollees. In addition, states could easily integrate their state eligibility data warehouses with Phase II and thus allow the ETCs to access their data warehouses through Phase II in real-time.

Implementing in phases will enable the rapid reduction and elimination of duplicates without the need for integration with state data warehouses containing program qualification data. However, to facilitate an effective solution, the FCC should encourage the states through incentives to make their data warehouses available for real-time secure access. In addition, the FCC should encourage vendors to submit a solution which could be standardized and implemented by all states, thus reducing the overall cost. It should not be cost prohibitive to design and build the solution so that it can be expanded to facilitate future functionality. Similarly, the solution can be flexible enough to accommodate the various processes in existence today and currently managed by the state commissions and agencies. Clearly ETCs, states, and state program administrators will benefit by having a central location with which they can

integrate without needing to significantly change their internal processes and through which they can communicate with each other and with third parties.

Topic 2: Overview of Phase I System Components

In this section, we present an overview of Phase I system components in a format designed to be easy to utilize. This document does not include a discussion of all components needed either to address issues in the rulemaking or for an RFP. Instead, it focuses on the key items where having a more detailed technical reference would appear to benefit the process.

The overall vendor requirements of the DEPM would entail the creation, deployment, and management of a solution with the following capabilities:

- (1) A nationwide, centrally-administered database of active Lifeline/Link Up enrollees, which is kept updated through real-time/near real-time and/or batch processes.
- (2) A dynamic workflow and rules engine that:
 - (a) Integrates in real-time with the enrollee database;
 - (b) Enables the continuous elimination of duplicate beneficiaries;
 - (c) Enables, as an option, a determination of household and right-party information to mitigate fraud for potential enrollments which rely on self certification and do not involve a credit check by the ETC;
 - (d) Enables special rules concerning tribal lands, rural Alaska, group homes, shelters, and similar exceptional circumstances to be implemented as described in the NPRM;
 - (e) Can be easily modified to reflect changes in the rules as implemented; and
 - (f) Can be easily audited by pre-approved and appropriate entities.
- (3) A real-time application programming interface (API) (and/or web interface) that ETCs can use to transmit customer information to receive real-time or near real-time and batch response message codes for address

confirmation, single benefit and right party determination. The API/web interface should:

- (a) Be secure, configurable and centralized;
 - (b) Be designed to respond rapidly with codes and descriptions of the rejection;
 - (c) Maximize the ability of ETCs to understand any rejection, so that they can identify the issue and resolve the problem while they are on the phone with the customer or while the customer is interacting with the ETC through a web interface;
 - (d) Allow connection to the DEPM in real-time utilizing the protocols and methodologies discussed below; and
 - (e) Enable the ETCs and states to easily transmit data utilizing their legacy systems with minimal changes through the protocols and methodologies discussed below.
- (4) A carrier-neutral, multi-channel, customer preference management system – the Customer Preference Management Module (CPMM) -- that enables the ETCs (or state Lifeline/Link Up administrators) to capture and convey the carrier preference of an enrollee in real-time and retain proof of the enrollee's selection. This module must:
- (a) Have sufficient capacity, response speed, and recognition accuracy, and be flexible enough to incorporate batch processes or be fully automated. This will allow ETCs to readily integrate database activities with their existing workflows, giving them the flexibility and speed to continue enrollments without new burdens. Similarly, if the Commission places restrictions on the number of times an individual can obtain Lifeline/Link Up benefits from any carrier, rules can be defined to enable the system to process benefit claims so as to give effect to these restrictions.
 - (b) Enable the integration of multiple response channels by ETCs, state administrators, and solution providers, so that program beneficiaries can express their ETC preferences via web, Integrated Voice Recognition (IVR), mail, or fax. Such functionality will enable all parties to leverage lower cost channels of communication where possible to reduce their operating expenses.

Topic 3: Overview of Phase I Operational Requirements

In Topic 3, we provide an overview of the operational requirements of Phase I, including but not limited to initial set-up, data population, and duplicate resolution. The vendor should address these requirements in its proposal.

Real-time, near-real-time, and batch operation

The PLLR believes that DEPM must function in real-time to ensure that the database is kept accurate and that new program participants can enroll for benefits or change carriers without delay. This means that the DEPM should enable – in real-time – the administrator to receive data and update the database, as well as to accommodate to those ETCs that must operate on a batch basis.

If the DEPM responds in real-time, ETCs would be able to provision Lifeline/Link Up service to a customer within the first call because they would be able to determine, by accessing the database while the prospective customer is on the line, whether the prospective customer already receives Lifeline/Link Up benefits from another ETC. If the database is not updated in real-time, consumers who qualify for Lifeline/Link Up benefits could find themselves without access to E911 and other phone services – for example, if a consumer moves into housing previously occupied by another Lifeline/Link Up enrollee and the database does not reflect the previous tenant’s termination of service when the consumer orders Lifeline/Link Up service at his/her new residence, the new tenant would likely be denied a subsidy. As such, the PLLR submits that real-time capability with support for batch processing as described must be an essential element of the DEPM.

Customer information

The PLLR believes that only the minimum information necessary to establish the identity and status of a Lifeline/Link Up customer should be collected and stored in the DEPM. The minimum information required is full name, address, last 4 digits of a Social Security number (4#SS), and date of birth (DOB). DOB must be collected to prevent minors from applying for the service.

Many stakeholders have expressed concern about the privacy and data security issues associated with collecting and retaining more extensive customer-specific information, such as complete Social Security numbers. The PLLR agrees with these concerns and believes that its proposal (name, address, phone number, name of carrier, type of service, date of service commencement, DOB and 4#SS) is a reasonable compromise between the protection of the customer’s privacy and the obligation of the customer to

provide sufficient information to minimize the likelihood of ineligibility due to duplication of benefits. Further, concerns about privacy can be addressed by ensuring the database complies with industry-standard data security requirements.

Population of and Updates to Database

The PLLR recommends that the FCC require all ETCs to provide their full enrollment information via a machine-readable format prior to a noticed due date to initially populate the database.

Thereafter, ETCs should be required to submit their new enrollment, change of address, and de-enrollment data either in real-time or in no later than a weekly batch. No ETC should request reimbursement for any new enrollee unless that enrollment has been submitted as described in this process. Once an ETC submits new enrollment information, a confirmation should be sent back to the ETC that the enrollment has been successfully added to the database or the enrollment is a duplicate/not qualified. A flag should be required to keep track of enrollments that have been successfully added.

The DEPM must be able to receive data in a batch format from ETCs and immediately allow them to continue to update their data on a flow basis so that all data is kept current.

The DEPM must have the capacity for users to update the database as indicated Topic 5 below to allow for integration with real-time and batch workflows from ETCs.

Timing of Initial Duplicate Resolution

The live stream of data submitted in real-time will be compared against all data received and provide a real-time response so that ETCs can resolve rejections and other problems while in communication with the consumer. However, the data received as a batch will not be compared to the data received from other ETCs prior to an initial “Batch Compare Date” to allow for all ETCs to submit their data thus preventing a repetitive process. The Batch Compare Date should be determined by the FCC on either a national or a state by state basis. Thus, the DEPM should allow for a staged Batch Compare Date, thus creating a smoother flow of duplicate resolution for the ETCs and for the consumers.

Duplicate Resolution Process

The process of identifying and resolving duplicate claims for Lifeline/Link Up benefits -- the Customer Preference Resolution Process (CPRP) -- must be a simple, seamless

process that is FCC-sanctioned, carrier-neutral, and easy for carriers and consumers to use. The responsibility for addressing and resolving the problems of duplicate benefits or service preferences should rest with the Administrator and not with the ETCs for the initial submissions. The DEPM should be able to determine the duplicates based on the rules as described in the final rulemaking. The rules may be limited to a single household as determined by same residential address and same family or other rules such as one per person as determined by same name, DOB, and 4#SS. Where the rules limit benefits to a single household, the rules should specify that the subscriber will be the head of the household.

The DEPM must provide error codes and descriptions in real-time (responses no greater than 3 seconds for non-exception managed submissions) for the ETCs who connect through a live interface. The error codes and descriptions must be informative and actionable so that the ETCs can work with the consumer to take the corrective action needed to resolve the issue. For ETCs interacting via a batch process, the same information must be communicated back via a batch file. The DEPM must enable ETCs to resolve any duplicate issues within an existing workflow or enrollment process for maintaining operations and reducing complexity and burden. As such, the duplicate resolution process should enable this integration by third parties and ETCs.

Performing the Initial Duplicate Resolution

Loading initial subscriber data into the DEPM. Within 15 business days of contract award, the Administrator should provide to the ETCs' contacts (as identified by USAC) written instructions on how to establish an account with the Administrator. The instructions should include the following information:

- (1) API details;
- (2) Data transfer information;
- (3) User log-in information;
- (4) Data requirements; and
- (5) Response codes.

The Administrator should provide online training and instructions, and offer webinars and other support for the ETCs to facilitate the implementation of the DEPM.

The Administrator should make the DEPM available for subscriber data loading by the ETCs within 30 days of contract award, and coordinate with the ETCs so that all ETC

Lifeline/Link Up subscriber data is loaded into the DEPM within 60 days of contract award.

Creating final subscriber lists (pre-duplicate resolution) for each ETC. The Administrator should analyze the subscriber lists submitted by the ETCs and convey back to each ETC, within 3 business days:

- (1) A data file of all submitted subscribers in which the address does not match a Coding Accuracy Support System (CASS) standard address;
- (2) A recommended CASS standardization of the address for those addresses in which a likely match can be identified; and
- (3) A list of bad data in the ETC's subscriber list (e.g., addresses that are incomplete or incomplete subscriber names or information), for the ETC to validate.

ETCs may, at their option, provide to the Administrator additional identifying information, eliminate subscribers without complete information, or make other corrections. If the ETC does not provide any corrections to the bad data list within 5 business days of the Administrator providing the list to the ETC, then the ETC's subscriber list should be presumed to be correct. If corrections are made, then the Administrator should re-run the new data and create a new list, which will serve as the final subscriber list. For those addresses for which no standardization exists (e.g., Indian land or rural areas in which a United States Post Office (USPS) address does not exist), the Administrator should facilitate an exception management process to validate the address and confirm the participation as directed by the Commission.

Creating lists of duplicates (Track 1 and Track 2) for resolution. Within 5 business days of the determination of the final subscriber lists for all identified ETCs, the Administrator should create 2 lists comprised of potential duplicates where the duplicate meets the criteria established by the Commission. The first list (Track 1) would be comprised of potential duplicates where the same individual at the same address receives two or more Lifeline/Link Up-supported services from two ETCs. The second list (Track 2) would be comprised of potential duplicates where separate individuals at the same address each receive Lifeline/Link Up -supported services. Track 2 would be divided into two categories: Track 2-A would contain the names of the multiple individuals at the same address who receive Lifeline/Link Up benefits from the same provider, while Track 2-B would contain names of the multiple individuals at the same address who receive Lifeline/Link Up benefits from different providers.

Performing the initial duplicate resolution for the Track I list (same individual, same address, two or more service providers). Upon completion of the lists, the Administrator would implement the following duplicate resolution process for the Track I list.

(1) The Administrator would give each ETC its Track 1 list of individual subscribers believed to be receiving duplicative Lifeline/Link Up benefits.

(2) The Administrator would identify a tentative “default ETC” for each subscriber from among the two (or more) carriers to which that individual is currently subscribed. The Administrator would randomly allocate subscribers to ETCs using a methodology that would proportionately distribute the subscribers among potential ETCs. For example, the Administrator would name each provider involved in duplicate resolutions where two ETCs provide service as the presumptive default ETC for 50% of that provider’s subscribers identified as having two Lifeline providers. Within 5 days of making this allocation, the Administrator would prepare and submit an allocation list to USAC and the FCC that shows the default ETC for each subscriber.

(3) Within 5 business days of making the allocation, or as soon as possible thereafter, the Administrator would send a letter containing the following information to each affected subscriber:

(a) The subscriber must choose between the duplicative Lifeline/Link Up providers or, on a going-forward basis, the subscriber will receive Lifeline/Link Up-supported service only from the provider identified in their letter as the default ETC.

(b) The subscriber has 35 days from the date listed on the letter to contact a toll-free number or visit a web URL to select a Lifeline/Link Up provider.

(c) A consumer-appropriate explanation of:

(i) The Lifeline/Link Up program requirements;

(ii) Why the proposed allocation action is necessary to ensure compliance with the FCC’s rules;

(iii) What changes the subscriber can expect to see when the subscriber is moved to a single Lifeline/Link Up provider (e.g., the carrier that will not be the Lifeline/Link Up provider going forward may raise rates on future services); and

(iv) What actions the subscriber can take when the subscriber is moved to a single Lifeline/Link Up provider (e.g., contact the carrier that will not be the Lifeline/Link Up provider going forward for information on future rate increases or to disconnect the service altogether).

(d) A toll-free number to call with questions.

(4) Ten days after issuance of the letter to the subscriber, the Administrator would send a colored postcard to the subscriber reminding the subscriber to make a selection by calling the toll free number or visiting the website. The ETCs would assist with the provision of the customer service and response mechanisms, including automated calls to subscribers who have failed to make a selection within 30 days.

(5) After the 35-day period has expired, the Administrator would update the original allocation list to reflect subscriber-generated provider selections and would provide that revised list to USAC. The Administrator would provide to each ETC a data file that includes the names of the ETC's subscribers who must be de-enrolled from the ETC's Lifeline/Link Up service (i.e., any subscribers that have not selected that provider or for which that provider is not the default ETC). If a Lifeline/Link Up subscriber does not call the toll-free number or visit the website to choose a provider, the presumptive original allocation to the default ETC will automatically become effective, and on a going forward basis, the subscriber will receive Lifeline/Link Up-supported service only from that provider.

Performing the initial duplicate resolution for the Track 2 list (different individuals, same address). Upon completion of the lists, the Administrator would implement the following duplicate resolution process for the Track 2 list.

(1) Within 10 business days of completing the lists, the Administrator would give each affected provider its Track 2-A sublist and its Track 2-B sublist.

(2) Each service provider would analyze its Track 2 lists to determine whether other information in its possession (e.g., more granular address information from billing systems or network provisioning data) either validates or refutes the existence of duplicative services. The provider would provide the Administrator with any corrections and the results of its analysis within 10 business days of receipt of its Track 2 list.

(3) Within ten days of receiving corrections from the ETCs, the Administrator would, if necessary, recompare the Track 2-B lists and generate updated lists of duplicates with inter-provider address matches. The Administrator would then report the summary results of this analysis to USAC and the Wireline Competition Bureau.

All ETCs would continue to provide Lifeline/Link Up-supported service to both Track 1 and Track 2 subscribers until notified by USAC, pursuant to the Commission's rules, to de-enroll certain subscribers. In addition, all ETCs would be reimbursed for the Lifeline/Link Up benefits provided to these subscribers up until the date of de-enrollment, subject to normal adjustments and other reporting requirements. Also, USAC should recover support for any subscriber for which subscriber data cannot be substantiated by the ETC and for any intra-company duplicative subscribers (i.e., same name, same address within one ETC's records).

Subsequent Duplicate Prevention

All ETCs should be required to resolve any duplicates as per the CPRP before the customer receives any benefit, the ETC submits a claim for reimbursement for the customer's benefit, or the customer is added to the DEPM database.

Limitations on Data Queries

The FCC should clearly limit data queries by ETCs to that data for which the ETC has a valid use, such as an actual enrollment request, change of address request, or de-enrollment request by the consumer. The FCC should prohibit any party from submitting data queries to determine whether an address is available for any other purpose, including marketing, unless such requirement conflicts with state rules.

Change of Address and De-Enrollments

ETCs must submit, within a reasonable time, data for a change of address on an enrollee, including the enrollee data for both the prior address and the new address. The DEPM will provide back codes and descriptions on the availability of the new address, and a code and description indicating the prior address is available. The system will also update the status of the prior address as available within the database. In addition, ETCs must submit within a reasonable time the data for de-enrollments for those subscribers who no longer qualify or have not satisfied the applicable annual verification requirement.

Exception Management for Phase I

The DEPM should ensure that qualified benefit recipients are not eliminated from Lifeline/Link Up. Specifically, there are a number of situations where duplicate addresses should be accepted:

- (1) Benefit recipient lives in a multiple unit dwelling (homeless shelter, a low income renter within a dwelling, etc.) containing a single address. The system should be able to flag those addresses informed by ETCs so that enrollees are not rejected.
- (2) Benefit recipient moves to an address where the previous occupant had the service benefit but has since moved. In this case, the new enrollee should be asked to certify that he/she is living in that address by providing proof within a limited time period. Similarly, the previous enrollee should be asked to provide a new valid and not used address by a specified date. Failure to provide appropriate proof by the date specified should result in a cancellation of service.

Phase II Considerations for Phase I

Through the addition of a state administration interface, Phase II allows a state to configure, manage, and audit the dynamic rules engine to the state's documentation requirements, thereby providing ETCs, solution providers, and state administrators an automated process for determining the eligibility of Lifeline/Link Up enrollees. In addition, states could easily integrate their eligibility data warehouses with the DEPM and thus allow the ETCs to access their data warehouses through the DEPM in real-time and through a batch process. In its proposal, the vendor should provide an overview of how its plans for Phase II affect its implementation of Phase I.

Topic 4: Phase I API and Module Functional Requirements

In Topics 4-7, we outline the technical details for the Phase I components. This section discusses the API and module functional requirements that the vendor should address in its proposal.

The DEPM should provide API interaction through the following functions:

- (1) Validate a service request, to check that the required information is complete and in the right format and return a result code and description in real-time or batch response;

- (2) Validate the address in the request, returning the appropriate result codes and descriptions in case it is invalid;
- (3) Check for duplicates:
 - (a) If duplicates are detected, reject the service request and log the attempt (for future reports on fraud prevention);
 - (b) If no duplicates are detected, return a code indicating that the address is currently available (address to remain available until the ETC confirms that the consumer accepted the service);
- (4) Confirm service request by ETC to ensure completion of the qualification process for an enrollee and change in the status of the address;
- (5) Cancel a reservation;
- (6) Update enrollee information for change of address and or other parameters as needed; and
- (7) De-enroll an existing service.

The following table depicts the minimum required modules to implement the DEPM, as well as the optional ones:

Module	DEPM	Required/Optional
CASS	Address matching and verification against the most current USPS data. For those submissions that are in areas not supported by the CASS, an alternative automated process combined with an exception management process must be implemented in a manner that follows the rules as described in the FCC's orders.	R
Fraud Prevention (LexisNexis, Experian)	Evaluation of enrollment information against different fraud detection patterns. This is implemented through an interface with LexisNexis, Experian, or other right party identification company. This process is optional for those carriers which do not perform any form of credit check and rely on self certification.	O for Wireless NA for Wireline

Module	DEPM	Required/Optional
Enrollment Annual Verification	Automated processing of Enrollment annual verifications for those states in which access to the state eligibility data warehouse is available in order to certify, after a certain period, that customers still fulfil the requirements to keep the service they applied for. Alternatively, be able to receive confirmation from the ETCs that the customer is still qualified. For those in which the qualification expires, communicate the de-enrollment to the ETC.	R – for the states in which a state eligibility data warehouse is provided in Phase I
Agent Duplicate Check and Data Entry Interface- ETCs	ETC User Secure Web Based Duplicate Check and Data Entry Interface used by Contact Center agents to create, update, view, cancel and reject enrollments contained in the database on a real-time basis. This module will allow those ETCs whose systems must work on a batch basis to be able to confirm in real-time that the consumer or address is available through a CSR-driven process, thus allowing for real-time confirmation without a real-time API integration.	R
Agent Duplicate Check and Data Entry Interface – Fax / Mail	Tools used by Administrator Back office agents that process mailed-in Carrier Preference forms, along with required documentation to prove eligibility, uploading them to enrollments that are approved or disapproved.	R
Agent Duplicate Check and Data Entry Interface – Escalations	Agent interface for inputting information for escalation handling in circumstances that meet the rules for exceptions which are not automatable but can be validated and documented.	R

Topic 5: Phase I Enrollment/De-enrollment Data Interfaces

This section discusses the enrollment/de-enrollment data interfaces that the vendor should address in its proposal.

#	Name	DEPM	Online/ Batch	From/ To	Input/ Output	File Type	Transfer Media
1	Optional Fraud Prevention - Personal Data Verification	Confirms if the person exists and his data is valid, according to his 4#SSN, Name and Address.	Online and batch	Right Party Identification Provider	I/O	Supports both XML and flat files	web service, in a channel encrypted with certificates (SSL) secure FTP
2	Subscription Request	Receives qualified enrollments from ETCs in order to reserve or confirm the use of an address.	Batch/Real-time	ETCs	I	XML	secure FTP
3	Subscription Response	Performs a duplicate check of the data sent in the "Subscription Request" and sends the result to ETCs.	Batch/Real-time	ETCs	O	XML	FTP
4	Form Outbound	Asks Mail House to send Carrier Preference Forms (fully prefilled) for customers.	Batch	Mail House	O	TSV (tab separated)	FTP

#	Name	DEPM	Online/ Batch	From/ To	Input/ Output	File Type	Transfer Media
5	Annual Verification Inbound	Receives confirmation from the ETCs that the customer is still qualified.	Batch	ETCs	I	Files of any kind	FTP
6	Update Inbound	Informs de- enrollments and failed qualifications in the verification process, as well as other changes to enrollment data.	Batch	ETCs	O	XML	secure FTP
7	De- Enrollments	Updates in Enrollment System the status for services cancelled by the Client.	Batch	ETCs		CSV (comma sepa- rated)	Email

Topic 6: Phase I Operational Rules

This section discusses the operational rules for Phase I that the vendor should address in its proposal.

When customer information is submitted and confirmed available, in addition to the confirmation code, a unique ID should be provided for that customer submission back to the ETC. In later updates and submissions related to that customer, the unique ID can be utilized in conjunction with the person's name and address to identify the account. The unique ID would also be able to be retrieved by submission of the consumer name, DOB and 4#SS.

The DEPM should be designed to respond to inquiries in a manner to confirm if the information submitted meets or does not meet the requirements. However, it should

not return any information contained in the database not submitted by the ETC other than result codes and descriptions and the assigned unique ID.

Topic 7: Phase I Access/Reporting Requirements

This section discusses the access and reporting requirements for Phase I that the vendor should address in its proposal.

Report	Frequency	Description
Enrollments per Hour and State of Residence	Daily	Enrollments created in the last 24 hrs, summarized by Hour and state of Residence.
Data for Stats - Enrollment Requests	Daily	Information of enrollments created in the last 24 hrs., per channel.
Active Enrollments by ETC and State	Monthly	All information needed for identification of active enrollments by ETC for each state.
Data for Stats – <Right Party Identification Provider> Logs	Daily	Log of calls to Right Party Identification Provider service.
Verification Dates	Daily	Enrollments with continued eligibility verified in the last 24 hrs.
Contact Center Daily Report	Daily	Call metrics: AHT (Average Handle Time), Abandon rate, Attendance, SL (Service Level), Occupancy.
Calls Per State	Daily	Count of calls per state (based on area code).
Contact Center Comparative Daily Report	Daily	Compare Contact Center metrics with the prior day/week/month.
Back office Daily Report	Daily	Carrier Preference Forms received - processed - not processed.
IVR Calls Transferred	Daily	Calls received on the IVR and transferred to the Contact Center, separated by queue.
Calls Activity by Site	Monthly	Raw data of calls answered by agents.
Site Hrs. by Day	Monthly	Raw data of agents times.
Back office Hrs.	Monthly	Back office Hrs., by day by agent.
Duplicate Benefit Preference Selection	Daily	Carrier preference results by contact channel and ETC.
ETC subscribers counts	Monthly	Count of customers per ETC & state.

Report	Frequency	Description
ETC subscribers status	Monthly	Count of customers per ETC & status (in/out/kept).
ETC activity	Daily/ Monthly	Count of calls, web visits, IVR transactions and mailing transactions by ETC.
ETC migrations	Monthly	Count of customers that move from one ETC to another.
Contact Center Calls Handled by ETC.	Daily/ Monthly	Total of calls Handled, Talk Time with identified callers.
IVR Time	Daily/ Monthly	IVR time allocation by ETC, IVR time by Unique PIN.
Pro-rated Contact Center Calls	Daily/ Monthly	Talk Time with unidentified callers, Total Time worked by agents (disregarding if they were speaking or not).
Pro-rated IVR time	Daily/ Monthly	IVR time by unidentified callers.
System Availability Report (SLA)	Daily/ Monthly/ Annual	Data measured by channel.
Outage Report (SLA)	Daily/ Monthly/ Annual	Data measured by channel.

Topic 8: Phase I Timing and Roadmap/Project Plan

Respondents to the RFP should include a timeline indicating the days from contract signature for each of the following milestones:

- (1) Contract Signed;
- (2) Equipment deployed and configured;
- (3) Specifications and functionality finalized;
- (4) System coded and configured;
- (5) Internal testing;
- (6) User Acceptance Testing; and

- (7) DEPM deployed and ready to receive data.

Topic 9: Phase II

In its proposal, the vendor should discuss its plans for Phase II. As discussed previously, Phase II would be the implementation of a technological solution to enable the full qualification of a consumer as well as automated annual verifications in the states in which access to state eligibility data warehouse is available. This solution could be operated by an administrator and integrated within an ETC's existing workflow. As a result, this solution would not only reduce the overall administration burden for ETCs, but would also reduce the administrative burden for management of the fund and for various state agencies. At a minimum, the system capabilities for Phase II must include:

- (1) Configuration of all qualifying and verification components on a state-by-state basis.
- (2) Ability to interact with state eligibility data warehouses as they are rolled out, to determine whether a person's submitted eligibility information is accurate and to perform annual qualification verifications.
- (3) Ability to operate under the current and/or future rules of those states in which the state eligibility data warehouse is not available.
- (4) Ability to modify the rules on a state-by-state basis as needed.
- (5) Ability for an authorized third party to review, audit, and test the systems functionality to confirm it meets with the specific rules.
- (6) Ability to demonstrate that the solution adheres to the rules as stated in the Commission's Order.
- (7) A workflow manager for Exception Management.

Duplicate elimination and preference management would continue during Phase II.

Topic 10: Phase I Cost

Based on the experience of the PLLR building duplicate elimination systems for ETCs, they are confident that an administrator with equivalent experience, innovative

capability, and technical competence would be able to design, develop, and deploy the DEPM within 90 days of contract. Within six months (or less) of the administrator entering into the contract, the DEPM should be populated by the major ETCs, and the process of eliminating and preventing duplicate claims can begin.

Core Cost Components of DEPM Deployment and Operation

- (1) Development of Custom Software. For a solution that meets all of the requirements, can scale, is effective and efficient, development of custom software is the most critical area and where substantial costs will be incurred. A well-designed solution will provide for the capability to configure and adapt the platform to changing circumstances and new requirements.
- (2) Software Licenses. A system such as this will need to run on a MS SQL or Oracle level database and Enterprise Class server software. The cost of these software licenses can be rather high; however, all software must be documented as fully licensed.
- (3) Equipment (including Security, Redundancy, and Shared Use). The cost of the equipment can vary greatly depending on a number of factors, including the level of security and shared use. We expect the DEPM will operate at the highest level of security, which will increase costs. In addition, at a minimum, the system should have a redundant location ideally with a hot/hot configuration to ensure the highest level of uptime. Sharing resources can reduce costs and is a common industry practice. If properly designed and implemented, shared resources also are generally very secure. (If the DEPM specification requires complete segregation of equipment used, for example, by enterprise clients, the development costs and lead time would increase.)
- (4) Project and Requirements Management. The cost of having a highly experienced project manager, analyst and architect can be very high. Yet, their experience should accelerate deployment and minimize the chance that the solution will fail.
- (5) Exception Staffing. The cost of exception staff is significant and will rise as the Commission increases the need for exception handling. A well-designed DEPM that encourages automation will reduce this cost and improve the customer experience.
- (6) Documentation Retention. If the DEPM requires retention of scanned images, this will greatly increase the size (cost) of the storage hardware.

Cost Recovery (Bid Specification)

- (1) DEPM Deployment and Overall System Operation. The cost of deploying and operating the DEPM should be recovered by a fixed charge for initial deployment and monthly maintenance. In addition, there should be a dip fee, which would allow for additional investment in the event that volume increases. Current estimates of the amount duplicate benefits being generated under the current program rules far exceed any cost estimate of creating the DEPM.
- (2) Exception Handling and Outreach. The requirements for exception handling and outreach can vary greatly. For exception handling, costs should be recovered on a per-hour basis for staff time. IVR should be recovered on a per minute basis. Mail should be recovered by the item handled or mailed, and any voice or text messaging recovered on a per-message basis.

Glossary

4#SS	Last 4 digits of a Social Security number
Administrator	The neutral, third-party administrator of the EDMP.
API	Application Programming Interface
CASS	Coding Accuracy Support System
CPMM	Customer Preference Management Module
CPRP	Customer Preference Resolution Process
CSR	Customer Service Representative
DOB	Date of Birth
DEPM or Phase I	Duplicate Elimination and Preference Management System
ETCs	Eligible Telecommunications Carriers
EDMP	Eligibility and Duplicate Management Platform
FCC	Federal Communications Commission
IVR	Integrated Voice Recognition
Lifeline/Link Up	Lifeline and Link Up program
NPRM	Notice of Proposed Rule Making
Phase I or DEPM	Duplicate Elimination and Preference Management System
Phase II	Eligibility and Verification
PLLR	Professionals for Lifeline and Link-up Reform
USAC	Universal Service Administrative Company
USPS	United States Postal Service

Attachment A

List of PLLR Members

CGM, LLC
CompTel
DPI Teleconnect
Emerios, a division of VMBC Corporation
Global Connections, Inc.
Image Access, Inc.
i-wireless, LLC
Midwestern Telecom, Inc.
Stand Up Wireless, LLC
TAG Mobile, LLC
Telrite, d/b/a Life Wireless
Terracom, Inc.
TracFone
West Corporation
YourTel America